

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,

10CV6005(RSW)

Plaintiff,

-against-

DECLARATION OF
SERVICE OF
BRIAN E. LEE

THE CITY OF NEW YORK, DEPUTY CHIEF MICHAEL MARINO, Tax Id. 873220, Individually and in his Official Capacity, ASSISTANT CHIEF PATROL BOROUGH BROOKLYN NORTH GERALD NELSON, Tax Id. 912370, Individually and in his Official Capacity, DEPUTY INSPECTOR STEVEN MAURIELLO, Tax Id. 895117, Individually and in his Official Capacity, CAPTAIN THEODORE LAUTERBORN, Tax Id. 897840, Individually and in his Official Capacity, LIEUTENANT JOSEPH GOFF, Tax Id. 894025, Individually and in his Official Capacity, SGT FREDERICK SAWYER, Shield No. 2576, Individually and in his Official Capacity, SERGEANT KURT DUNCAN, Shield No. 2483, Individually and in his Official Capacity, LIEUTENANT CHRISTOPHER BROSCART, Tax Id. 915354, Individually and in his Official Capacity, LIEUTENANT TIMOTHY CAUGHEY, Tax Id. 885374, Individually and in his Official Capacity, SERGEANT SHANTEL JAMES, Shield No. 3004, and P.O.'s "JOHN DOE" #1-50, Individually and in their Official Capacity (the name John Doe being fictitious, as the true names are presently unknown) (collectively referred to as "NYPD defendants"), JAMAICA HOSPITAL MEDICAL CENTER, DR. ISAK ISAKOV, Individually and in his Official Capacity, DR. LILIAN ALDANA-BERNIER, Individually and in her Official Capacity and JAMAICA HOSPITAL MEDICAL CENTER EMPLOYEE'S "JOHN DOE # 1-50, Individually and in their Official Capacity (the name John Doe being fictitious, as the true names are presently unknown),

Defendants.
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BRIAN E. LEE, declares the following pursuant to 28 USC §1746, under penalty of perjury:

That I am a Member of Ivone, Devine & Jensen, LLP, the attorneys for the defendant ISAK ISAKOV, M.D., and am fully familiar with the facts and circumstances of this action by virtue of a review of the file in my office.

That on January 30, 2015, I served the Amended motion papers in this matter on all parties, via secure e-mail as agreed by and between the parties. The following items were served:

Amended Notice of Motion dated January 30, 2015
Amended Memorandum of Law dated January 30, 2015
Amended Declaration of Brian E. Lee dated January 30, 2015 with Exhibits:
Exhibit A: Second Amended Complaint
Exhibit B: Answer of Dr. Isakov to Second Amended Complaint
Exhibit C: Records of Jamaica Hospital medical Center (being filed under seal)
Exhibit D: Excerpts of deposition of plaintiff
Exhibit E: Excerpts of depositions of City witnesses
Exhibit F: Third Amended Complaint
Exhibit G: Order of Judge Sweet dated January 16, 2015
Affidavit of Isak Isakov dated December 22, 2014 (being filed under seal)
Local Rule 56 Statement of Material Facts dated December 22, 2014

Dated: Lake Success, New York
January 30, 2015

Yours, etc.,

IVONE, DEVINE & JENSEN, LLP

/s/ Brian E. Lee

By:

BRIAN E. LEE (9495)
Attorneys for Defendant
ISAK ISAKOV, M.D.
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